

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**In re:** ) **Chapter 11**  
 )  
CIRCUIT CITY STORES, INC., *et al.*, ) **No. 08-35653-KRH**  
 )  
**Debtors.** ) **Jointly Administered**

**NOTICE OF MOTION FOR LEAVE TO APPEAL**

PLEASE TAKE NOTICE that LG ELECTRONICS USA, INC. ("LG"), by counsel, WILEY REIN LLP, H. Jason Gold, Valerie P. Morrison and Dylan G. Trache, has filed a Motion for Leave to Appeal ("Motion").

- On or before fourteen (14) days after service of this Notice, any adverse party may file with the clerk at the address show below, an answer in opposition to the Motion, pursuant to Federal Rule of Bankruptcy Procedure 8003. If you mail your response to the Court for filing, you must mail it early enough so the Court **will receive** it at or before the date specified above.
  - Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, Virginia 23219
  - You must **also** serve a copy of your response to the persons listed below.

H. Jason Gold  
Valerie P. Morrison, Esquire  
Dylan G. Trache, Esquire  
WILEY REIN LLP  
7925 Jones Branch Drive, Suite 6200  
McLean, Virginia 22102

Dated: January 19, 2010

Respectfully submitted,

LG ELECTRONICS USA, Inc.

By Counsel

WILEY REIN LLP  
7925 Jones Branch Drive, Suite 6200  
McLean, Virginia 22102  
703.905.2800

By: /s/ Dylan G. Trache  
H. Jason Gold, Va. Bar No. 19117  
Valerie P. Morrison, Va. Bar No.  
Dylan G. Trache, Va. Bar No. 45939

Counsel to LG Electronics USA, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2010 the foregoing Notice of Motion for Leave to Appeal was served via first class mail, postage prepaid, upon:

**Circuit City Stores, Inc. (Appellee)**

Circuit City Stores, Inc.  
Attn: Michelle Mosier  
4951 Lake Brook Drive, Suite # 500  
Glen Allen, VA 23060

Represented by:

Gregg M. Galardi  
Ian S. Fredericks  
Skadden Arps Slate Meagher & Flom, LLP  
One Rodney Square  
10<sup>th</sup> and King Streets, 7<sup>th</sup> Floor  
Wilmington, DE 19801

Chris L. Dickerson  
Jessica S. Kumar  
Skadden Arps Slate Meagher & Flom, LLP  
155 North Wacker Drive  
Chicago, Illinois 60606

Douglas M. Foley  
Sarah B. Boehm  
McGuireWoods LLP  
One James Center  
901 E. Cary Street  
Richmond, VA 23219

**Official Committee of Unsecured Creditors**

Represented by:

Jeffrey N. Pomerantz  
Stanley E. Goldich  
Pachulski Stang Ziehl & Jones LLP  
10100 Santa Monica Boulevard, 11<sup>th</sup> Floor  
Los Angeles, CA 90067

Robert J. Feinstein  
Pachulski Stang Ziehl & Jones, LLP  
780 Third Avenue, 36<sup>th</sup> Floor  
New York, NY 10017

Lynn L. Tavenner  
Paula S. Beran  
Tavenner & Beran, PLC  
20 N. Eighth Street, Second Floor  
Richmond, VA 23219

**Office of the United States Trustee**

Represented by:

Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad Street, Suite 4304  
Richmond, VA 23219

/s/ Dylan G. Trache  
Dylan G. Trache

13094326.1